



**California Association of  
Competitive Telecommunications Companies**

Communications, Commerce, Community

March 9, 2006

**VIA ECFS**

Marlene M. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Ex Parte: WC Docket 05-261, WC Docket No. 04-313 and CC Docket No. 01-338**

Dear Ms. Dortch:

Attached for inclusion in the above referenced dockets in further support of Fones4All Corporation's ("Fones4All") Emergency Petition for Interim Waiver is a copy of a filing made by the California Association of Competitive Telecommunications Companies (CALTEL) on behalf of its members in response to SBC California's Emergency Motion to Compel Transition.

Although this document was filed on February 24, the issues described by CALTEL member Telekenex remain largely unresolved as of this date. I have attached supplemental email messages exchanged between Telekenex and its account managers at SBC California which continue to highlight SBC's lack of cooperation, responsiveness and workable processes for the transition of more complicated facilities-based services like unbundled transport.

There are two primary points to the attached filing. The first is that it is easy to underestimate the time-consuming and technically difficult efforts that were required by small CLECs with limited resources who are transitioning from UNE-P to UNE-L service arrangements for their small and medium business customer base, many of whom have undertaken extraordinary efforts over a two year period to purchase switches, obtain collocation space, and determine the final list of unimpaired offices. Secondly, given these challenges and the amount of progress that has been achieved to date, CALTEL still believes that a fair and reasonable arrangement can be negotiated that transition the remaining UNE-P circuits "in an orderly manner that does not negatively impact customer service, does not unduly tax SBC California or CLEC systems and personnel, and which does not disadvantage SBC California from a financial perspective."

Sincerely,

/s/

Sarah DeYoung  
Executive Director, CALTEL  
50 California Street, Suite 1500  
San Francisco, CA 94111  
(925) 465-4396  
(877) 517-1404 (fax)

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of Pacific Bell Telephone  
Company, d/b/a SBC California for Generic  
Proceeding to Implement Changes in Federal  
Unbundling Rules Under Sections 251 and 252  
of the Telecommunications Act of 1996.

A.05-07-024

**RESPONSE OF THE CALIFORNIA ASSOCIATION OF COMPETITIVE  
TELECOMMUNICATIONS COMPANIES (CALTEL)  
ON THE EMERGENCY MOTION OF SBC CALIFORNIA TO COMPEL UNE-P  
TRANSITION  
(CONFIDENTIAL UNREDACTED)**

Sarah DeYoung  
Executive Director, CALTEL  
50 California Street, Suite 1500  
San Francisco, CA 94111  
(925) 465-4396  
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February 24, 2006

**BEFORE THE PUBLIC UTILITIES COMMISSION  
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Application of Pacific Bell Telephone  
Company, d/b/a SBC California for Generic  
Proceeding to Implement Changes in Federal  
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ON THE EMERGENCY MOTION OF SBC CALIFORNIA TO COMPEL UNE-P  
TRANSITION**

Pursuant to Rule 45 of the Commission's Rules of Practice and Procedure, and to instructions issued by Administrative Law Judge Karen Jones on Tuesday, February 14 and Thursday, February 16, The California Association of Competitive Telecommunications Companies (CALTEL) hereby files its response to the Emergency Motion of SBC California which seeks to compel CLECs identified by SBC (in confidential Attachments) to transition their embedded base of UNE-P lines to alternative arrangements by March 11, 2006, filed on February 10, 2006.

In discussions with many CALTEL members over the past two weeks, it appears that they generally were surprised to find themselves listed on SBC California's Attachments and will be filing responses, affidavits and other detailed information today through their individual counsel. In this filing, CALTEL is including a response on behalf of one of its members, Telekenex, to illustrate the significant efforts required of facility-based CLECs (i.e. those who do not intend to transition circuits to Resale or Local Wholesale Complete) and the lack of cooperation and responsiveness from SBC California received by these carriers to-date. Other

CALTEL members who are simply interested in transitioning a relatively small base of UNE-P lines to Local Wholesale Complete will be filing separate responses that illustrate a similar lack of cooperation and responsiveness from SBC California.

Equally important, CALTEL is making the Commission aware that it has reached out to SBC California several times to offer to negotiate individual or consolidated transition plans on behalf of its members or the CLEC industry more generally, in much the same way that it facilitated a settlement of UNE True-Up disputes this time last year. SBC California's response to that offer was to advise that it needed to "go after" recalcitrant CLECs before it was willing to enter into any discussions that might lead to documented and mutually-workable transition plans.

#### **I. Discussion – Significant Efforts Required by Carriers Transitioning from UNE-P to UNE-L**

SBC California's Emergency Motion does not even begin to recognize the time-consuming and technically difficult efforts that are required by small CLECs with limited resources who are transitioning from UNE-P to UNE-L service arrangements for their small and medium business customer base. Telekenex, which is headquartered in San Francisco, is one of those carriers.

Anthony Zabit, Telekenex's COO/CFO, and who serves on the CALTEL Board of Directors, has provided the following background information to CALTEL:

"I began my migration of UNEP almost two years ago when the original TRO came down (from the FCC). At that point I implemented a switch and became a facilities based carrier. Over the following 12 months I reinstalled approximately 180 PRI's (retail private line circuits) to customer premises in order to roll my customers to my switches. As SBC refused to allow me to use existing UNE Ds1 facilities I had to make 3-4 truck

rolls per PRI including after hours cuts with the customer present in order to accomplish this.

“When the TRRO came up last year I spent an additional \$1.5 million on additional switching facilities to accommodate the migration of my roughly 5500 analog DS0 UNE-P lines. I had not anticipated the need to move these lines until the TRRO came out. Over the past year, I have migrated almost 4000 analog lines onto my switches. This required 2-4 truck rolls per customer to test new T1 facilities, hang customer prem(ise) equipment, identify existing lines and port the customer over to my facilities. A summary of my remaining analog lines are as follows:

- 608 Lines will be converted to resale (too small to justify a T1 loop)
- Approximately 700 lines as of 2/1 not migrated yet (many of which are scheduled to go this month)
- 150 Lines to disconnect (hopefully SBC will work my disconnects this month)
- 5-10 UNEP PRI's (Unsure on quantity as SBC has continued to misbill me for circuits that I have previously migrated)

“I receive my SBC bill in copier paper sized boxes on a monthly basis on about the 13<sup>th</sup> of the month. It takes me 7-10 days to analyze the bills and get them into a usable format. As the number of lines is decreasing rapidly through my migration, it is becoming more manageable. I requested a 4 week extension for my analog lines so that I can analyze my February bill and migrate the stragglers that don't get handled this month.

“Upon issuance of the TRRO I began researching alternate technologies to deliver the all important DS1 loop to my customers in the unimpaired offices. According to SBC I have approximately 100 DS1s in non-impaired central offices that need to be migrated off of UNE. Upon isolating the technology I immediately began the collocation process with SBC. Based on the lead times from SBC for collocation I have only had two of the six collocations turned over to me (I am collocating in all of the DS1 unimpaired CO’s in Northern California). I (really need) an extension until the end of June for the migration of my UNE DS1s in unimpaired offices. My delays in migration were caused by lengthy lead times in collocation, uncertainty as to the actual list of the CO’s (as the final list was not published until mid December based on conditions of the AT&T merger), and uncertainty as to the process to be used (which SBC is still unsure of, as the amendment to the ICA is just being (finalized and) implemented).”

Mr. Zabit has also copied me on a number of emails that he has sent to SBC California over the past several months, which further document his attempts to reach agreement on a workable transition plan for his relatively small business customer base. The above narrative, as well as these email messages (included as Attachment A) and press releases relating to Telekenex’s facilities purchases in 2004, demonstrate the extraordinary efforts that have been expended over a two year period by many of these carriers, the amount of progress that has been achieved to date, and the wisdom of negotiating mutually-workable transition plans, either with CALTEL or with individual carriers, rather than diverting resources to file or respond to emergency motion that do not even begin to tell the whole story.

## **II. Discussion – CALTEL’s Has Offered to Help Negotiate Workable Transition Plans**

As the Commission is aware, CALTEL was instrumental in negotiating a settlement agreement between SBC California and the CLEC industry last year in connection with disputed true-up amounts owed as a result of D-04-09-063. CALTEL is making the Commission aware that it reached out to SBC California regulatory personnel on Friday, February 3 to offer to help negotiate individual or consolidated transition plans on behalf of its members or the CLEC industry more generally, in much the same way that it facilitated the UNE True-Up settlement. SBC California’s response to that offer came a week later, on Friday, February 10, to advise that it needed to “go after” recalcitrant CLECs before it was willing to enter into any discussions that might lead to documented and mutually-workable transition plans. SBC California filed its emergency motion several hours later.

Now, two more critical weeks have been wasted, with both SBC and CLEC resources diverted, in the unproductive preparation of emergency motions, affidavits and response filings. Despite that delay, CALTEL believes that a fair and reasonable arrangement can still be negotiated that transition the remaining UNE-P circuits in an orderly manner that does not negatively impact customer service, does not unduly tax SBC California or CLEC systems and personnel, and which does not disadvantage SBC California from a financial perspective.

## **II. Conclusion**

CALTEL stands ready to assist the Commission and SBC California to negotiate workable transition plans on behalf of its members or the CLEC industry in general.



Respectfully Submitted,

Sarah DeYoung  
Executive Director, CALTEL  
50 California Street, Suite 1500  
San Francisco, CA 94111  
(925) 465-4396  
(877) 517-1404 (fax)  
[deyoung@caltel.org](mailto:deyoung@caltel.org)

Dated: February 24, 2006

Attachment A to

RESPONSE OF THE CALIFORNIA ASSOCIATION OF COMPETITIVE  
TELECOMMUNICATIONS COMPANIES (CATEL)  
ON THE EMERGENCY MOTION OF SBC CALIFORNIA TO COMPEL UNE-P  
TRANSITION

(CONFIDENTIAL UNREDACTED)

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the RESPONSE OF THE CALIFORNIA ASSOCIATION OF COMPETITIVE TELECOMMUNICATIONS COMPANIES (CALTEL) ON THE EMERGENCY MOTION OF SBC CALIFORNIA TO COMPEL UNE-P TRANSITION (CONFIDENTIAL UNREDACTED) on the Docket Office of the Commission, the Assigned Commissioner, the ALJ Karen Jones and SBC California.

Executed on February 24, 2006, at Walnut Creek, California.

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Sarah DeYoung

**Sarah DeYoung**

**From:** Anthony Zabit [azabit@ndw.com]  
**Sent:** Wednesday, February 15, 2006 7:25 PM  
**To:** Anthony Zabit; rh3176@sbc.com  
**Cc:** Sarah DeYoung; glenn@stoverlaw.net; Mike Lynch; po2652@sbc.com  
**Subject:** RE: Sec. 2.1.3.4 of the TRO/TRRO amendment

Bob,

As you know we have been extremely diligent in working our UNEP migration. I was very disconcerted to see that here that you listed me with the CLECs who have not been making a diligent effort to migrate our traffic by the deadline. I have been migrating towards this deadline for more than 2 years now. As you know I became a facilities based provider more than 2 years ago. I purchased and implemented switches covering the San Francisco, Sacramento, Stockton, Fresno, LA and San Diego latas in this timeframe in order to achieve this migration.

Please see in the email below I requested a meeting with you and someone in your organization to discuss the mechanics of implementing this March deadline as well as a request based on some logistical timing issues related to the March 11<sup>th</sup> date. You promptly responded that you would setup a meeting, but were not sure if all of the decisions had been made in order to provide me with clear direction. The meeting was ultimately scheduled for January 25<sup>th</sup>. At that time I met with you and Paul O'Sullivan (your boss) to discuss my issues. Although the discussions were lengthy I asked for 2 main items:

1. An extension of time beyond the March 11<sup>th</sup> deadline which is referenced as negotiable per section 2.1.3.4 referenced below. I asked for what I believe were very reasonable extensions for 2 types of services.
  - a. We are having quite a lot of difficulty resolving our records with your as to exactly what lines are outstanding to be converted. We are generally doing a manual reconciliation of your paper bills every month when our bills come. In many cases the bills are showing lines that I have already ported and or disconnected. This is further complicating the planning process. I have to assume that every line on the bill is active and needs to be migrated. As I migrate I often am told by your ops people that these lines are not in your database, to later find that they are incorrect and they actually are (please see 2 emails sent Friday 1/20) referencing orders not accepted. You subsequently told me that it was a training issue and would be fixed. I just received my paper bill (probably about 1000-2000 pages) on Tuesday February 13<sup>th</sup> (this was the bill for the period ending 1/31). I have now manually entered all of the phone numbers into excel and am comparing them against my migration planning documents. My goal is to get the sample of numbers down to a small enough level so that I can pickup any lines that I have missed. As I mentioned in my call with you and Paul I expect to have 95% of the numbers migrated or identified to go to resale by the end of the month. The problem is that I need that March bill to isolate the remaining 5% to be migrated. As I mentioned in the call if I am given until the end of March at a minimum I will be able to digest that March bill and migrate the stragglers. I am not asking for the world here and I think that this is a reasonable request.
  - b. In regards to migrating our DS1 loops in central offices that are unimpaired: Based upon the eventuality that we were going to be required to make the move we began the process of applying for collocation in these CO's mid year of 05. As you know SBC has quite extended intervals. I still have not gotten all of the 5 Cos that I applied for released to me. Furthermore based the ATT SBC merger the final list of Cos at issue was not even provided until December. The final interconnection agreement that spelled out some of the specifics of our migration options was not adopted by the PUC until the end of January. The delay (i.e. merger of SBC/ATT) was definitely not contemplated in the TRRO order and the extended uncertainty that resulted should not be harmful to me. Based on the fact that I am pursuing collocation and hampered by extensive lead times and the uncertainty of the CO's I requested an extension of my deadline to migrate unimpaired DS1s to June 30<sup>th</sup>. This will allow me to complete my colo with you and migrate the roughly 100 T-1s to my own HDSL

2/24/2006

facilities.

2. I also asked for clarity as to what happens to circuits that I miss inadvertently by the March 11<sup>th</sup> deadline (i.e. do they automatically convert to resale and special access) or..... I asked for confirmation that there would be no nrc's for this conversion (per the adopted interconnection agreement) as these would just be records changes.

Paul's answer to both of these main points and all of my specific questions was that he was unsure as to what position SBC/ATT was taking. He said that he had quite a few requests from CLECs for both extensions and clarity on the ground rules for the transition. He further stated that he would get back to me by Thursday January 27 with a position on how much of an extension was going to be available across the board to all CLECs as well as clarity as to what the groundrules would be. I received no call or communication from ATT on the issues.

My next communication came in the form of a letter dated February 7<sup>th</sup> from ATT. This appeared to be clarification stating that 90 days from the receipt of this letter the UNES would be discontinued. Myself and a number of CLEC's understood this to be an extension of almost 2 months beyond the March 11<sup>th</sup> deadline.

I then received a bunch of emails and a requirement to file a response to your CPUC filing for not diligently pursuing the March 11<sup>th</sup> deadline. I was then informed there were no extensions being provided.

I hope that ATT will reconsider its hardline position on this issue. We have been working diligently at the direction of the FCC to move our traffic to our facilities. I would hope that since SBC has succeeded in taking out its biggest competitor through this acquisition it would act more compassionately towards the few remaining small competitors in the marketplace. As you know having lost ATT as a voice for competition we are hobbled without significant lobbying and legal representation. I do however believe that this kind of hard lined approach will not be looked on favorably by the CPUC. I guess that I had wrongly assumed that having decimated the majority of the competition SBC would see value in having a few competitors in order to keep up the façade that they are not a monopoly. Please prove me wrong.

What is next

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**From:** Anthony Zabiti  
**Sent:** Friday, January 13, 2006 11:00 AM  
**To:** 'ROBERT R HEALY (PB)' (rh3176@sbc.com)  
**Cc:** 'Sarah DeYoung'; 'glenn@stoverlaw.net'; Mike Lynch  
**Subject:** Sec. 2.1.3.4 of the TRO/TRRO amendment

Bob,

I would like to setup a meeting with you and someone within SBC/ATT to discuss our plans for migration. As you know we are moving forward with turnup of collocation in what are our perceptions of unimpaired CO's. As you know the recent ATT merger puts the current list in limbo as SBC/ATT has agreed to provide a new list of CO's taking ATT's fiber out of the calculations. This uncertainty in combination with the lead times associated with collocation puts some of my migrations (particularly migration from UNEP DS0/DS1 to facility based XDSL DS1 loops) in doubt by the March 11<sup>th</sup> deadline. Please see below SBC proposed verbiage from the proposed amendment to the interconnection agreement in regards to extension of the March 11<sup>th</sup> timeframe. In addition although I have been working diligently in migrating my DS0 lines there will be some cleanup that is required of miscellaneous lines. Some will need to be converted to Resale some will need to be migrated to my switch via the above referenced xDSL DS1s out of my impending collocations. I would like to discuss an orderly conversion of the DS0s that I can't possibly migrate to my switch to resale and a possible extension per the provision below of the DS0s that will be migrated to facilities from my impending colo. Another topic that I would like to discuss is gaining clarity on the NRC's or lack thereof involved with migration of UNEP DS0s to resale, unimpaired T-1s to special access (the ones that will not migrate to my impending colo) as well as the process on grooming circuits to alternate impaired routes for DS1 transport if necessary.

Who from your side would you recommend attend the meeting with you that can discuss the above

2/24/2006

mentioned issues? It has been recommended that Mark Chamberlain would possibly be an appropriate individual. How soon can we setup a meeting to discuss these items as I need to ensure that we will be able to coordinate an orderly transition. I also need to determine whether you guys will work with me or if I need to seek regulatory relief from the CPUC and clarification from the CPUC.

- 2.1.3.4 To the extent there are CLEC Embedded Base ULS/ UNE-P arrangements in place at the conclusion of the twelve (12) month transition period, SBC, without further notice or liability, will re-price such arrangements to ***market-based rates***. However, if CLEC has met all of its due dates as agreed to by the Parties, ~~and the rates are negotiated between the Parties~~ and SBC does not complete all of the tasks necessary to complete a requested conversion or migration, then until such time as such ULS or UNE-P remains in place it should be priced at the rates in the Pricing Schedule attached to the Agreement plus \$1.00.

2/24/2006

**Sarah DeYoung**

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**From:** Anthony Zabit [azabit@ndw.com]  
**Sent:** Wednesday, January 25, 2006 9:51 AM  
**To:** HEALY, ROBERT R (PB); Anthony Zabit  
**Subject:** RE: Sec. 2.1.3.4 of the TRO/TRRO amendment

I would like to discuss the following items on our call today: UNEP DSO migration plan  
Disputes for lines already migrated  
Reconciliation of March invoice for remaining UNEP / Record cleanup  
Ordering process for orderly migration to Resale  
NRCs  
Unimpaired Dsl Migration  
SBC Collocation  
Special access migration  
Options  
Ordering process  
NRC's

-----Original Message-----

**From:** Anthony Zabit  
**Sent:** Friday, January 13, 2006 11:00 AM  
**To:** HEALY, ROBERT R (PB)  
**Cc:** Sarah DeYoung; glenn@stoverlaw.net; Mike Lynch  
**Subject:** Sec. 2.1.3.4 of the TRO/TRRO amendment

Bob,

I would like to setup a meeting with you and someone within SBC/ATT to discuss our plans for migration. As you know we are moving forward with turnup of collocation in what are our perceptions of unimpaired CO's. As you know the recent ATT merger puts the current list in limbo as SBC/ATT has agreed to provide a new list of CO's taking ATT's fiber out of the calculations. This uncertainty in combination with the lead times associated with collocation puts some of my migrations (particularly migration from UNEP DSO/DS1 to facility based Xdsl DS1 loops) in doubt by the March 11th deadline. Please see below SBC proposed verbiage from the proposed amendment to the interconnection agreement in regards to extension of the March 11th timeframe. In addition although I have been working diligently in migrating my DSO lines there will be some cleanup that is required of miscellaneous lines. Some will need to be converted to Resale some will need to be migrated to my switch via the above referenced xdsl DS1s out of my impending collocations. I would like to discuss an orderly conversion of the the DSOs that I can't possibly migrate to my switch to resale and a possible extension per the provision below of the DSOs that will be migrated to facilities from my impending colo. Another topic that I would like to discuss is gaining clarity on the NRC's or lack thereof involved with migration of UNEP DSOs to resale, unimpaired T-1s to special access (the ones that will not migrate to my impending colo) as well as the process on grooming circuits to alternate impaired routes for DS1 transport if necessary.

Who from your side would you recommend attend the meeting with you that can discuss the above mentioned issues? It has been recommended that Mark Chamberlain would possibly be an appropriate individual. How soon can we setup a meeting to discuss these items as I need to ensure that we will be able to coordinate an orderly transition. I also need to determine whether you guys will work with me or if I need to seek regulatory relief from the CPUC and clarification from the CPUC.

2.1.3.4 To the extent there are CLEC Embedded Base ULS/ UNE-P arrangements in place at the conclusion of the twelve (12) month transition period, SBC, without further notice or liability, will re-price such arrangements to market-based rates. However, if CLEC has met all of its due dates as agreed to by the Parties, including dates renegotiated between the Parties, and SBC does not complete all of the tasks necessary to complete a requested conversion or migration, then until such time as such ULS or UNE-P remains in place it should be priced at the rates in the Pricing Schedule attached to the Agreement plus \$1.00.



Message

**Sarah DeYoung****Subject:** FW: Sec. 2.1.3.4 of the TRO/TRRO amendment

**From:** HEALY, ROBERT R (PB) [mailto:rh3176@att.com]  
**Sent:** Friday, January 13, 2006 11:45 AM  
**To:** Anthony Zabit  
**Cc:** HEALY, ROBERT R (PB)  
**Subject:** RE: Sec. 2.1.3.4 of the TRO/TRRO amendment

Anthony,  
Do you mean this list? I'm working on your other items.

Bob.

-----Original Message-----

**From:** Anthony Zabit [mailto:azabit@ndw.com]  
**Sent:** Friday, January 13, 2006 11:00 AM  
**To:** HEALY, ROBERT R (PB)  
**Cc:** Sarah DeYoung; glenn@stoverlaw.net; Mike Lynch  
**Subject:** Sec. 2.1.3.4 of the TRO/TRRO amendment

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2.1.3.4 To the extent there are CLEC Embedded Base ULS/ UNE-P arrangements in place at the conclusion of the twelve (12) month transition period, SBC, without further notice or liability, will re-price such arrangements to market-based rates. However, if CLEC has

2/24/2006

## Message

met all of its due dates as agreed to by the Parties, including future conversions and migrations. If Parties and SBC does not complete all of the tasks necessary to complete a requested conversion or migration, then until such time as such ULS or UNE-P remains in place it should be priced at the rates in the Pricing Schedule attached to the Agreement plus \$1.00.

2/24/2006

**TMC**  
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**TMC**

**NEWS**

[October 19, 2004]

**Business Wire**

## Next-Generation Telecommunications Operator Telekenex Launches VocalData Hosted IP Services

**BOSTON --(Business Wire)-- Oct. 19, 2004 --** Integration of VocalData's market-leading application server with Tekelec 7000 Class 5 Packet Switch provides efficient, scalable solution to deploy IP-based services

VocalData, a Tekelec company (NASDAQ: TKLC) and market leader in hosted IP telephony solutions, today announced Telekenex, a next-generation telecommunications operator serving enterprises and carriers nationwide, has deployed VocalData's application server to support hosted IP telephony services. VocalData's robust IP Telephony feature set is deeply integrated with the operator's existing Tekelec 7000 Class 5 Packet Switch to provide a full suite of enhanced applications.

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**V&X**

The deployment demonstrates the benefits of the combined Tekelec-VocalData switching solution to deliver a highly reliable, scalable, multi-service platform that enables operators to deliver next-generation services from time division multiplexing (TDM) or IP network environments.

<http://www.tmcnet.com/usubmit/2004/oct/1084588.htm>

2/24/2006

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Headsets	Since deploying hosted IP telephony services nationwide this year, Telekenex has provided customers with VocalData's carrier-class performance and robust feature set, including unified messaging, user-scheduled conferencing, click to dial and web-based user control over services such as find me/follow me. In addition, VocalData's Web Portal capabilities support visual voicemail, click-to-dial and integration of directories and calendars with telephony features, allowing the operator to quickly create a personalized, browser-based customer portal to boost brand awareness and increase customer ease-of-use.
Hosted IP	
Hosted VoIP	
Hybrid IP	
Internet Phone	The Tekelec 7000 switch has been operating in Telekenex's network for several months, providing a versatile solution for delivering local, long distance and data services. It also provides a foundation to deliver hosted and managed IP telephony services such as those enabled by VocalData's application server.
IP Communications	
IPCC	"After evaluating the competition, we chose VocalData because of its customer base, market leading position and responsiveness. Another critical factor was its ability to integrate seamlessly with our existing Tekelec 7000 switch," said Anthony Zabit, chief operating officer. "The complete integration of VocalData's IP Telephony solutions and Tekelec's Class 5 switching platform was the perfect fit to provide next-generation services to our customers."
IP Conferencing and Collaboration	
IP-PBX	
IP-Phone System	Lori Craven, Tekelec's chief operating officer, added, "VocalData's IP Telephony solutions offer Telekenex an unparalleled suite of next-generation features with the combined benefits of Tekelec's Class 5 switch. Our superior flexibility, functionality, reliability and cost-effectiveness have enabled Telekenex to minimize costs while offering differentiated services to retain and attract additional customers."
IP Services	
Media Processing	
Metro Ethernet	Please visit booths #318 or #424 during the Fall Voice on the Net (VON) conference in Boston to find out more information about the benefits of the companies' consolidated switching solution.
Open Source PBX	About Telekenex
Packet Telephony	Telekenex is a next-generation telecommunications service provider serving enterprises and carriers with a robust national network, and innovative solutions, including: local, long distance, international calling, high-speed data transmission and Internet services, and a full suite of customer premise communications equipment and hosted IP telephony solutions. Telekenex helps companies reduce communication costs, increase employee productivity with new business collaboration solutions and eliminate the expense and complexity of managing legacy PBX solutions. Telekenex is headquartered in San Francisco, Calif.
Session Border Control	
Selecting VoIP Solutions	
SIP	
Small Business VoIP	About Tekelec and VocalData

Tekelec is a leading developer of now and next-generation switching and

<http://www.tmcnet.com/usubmit/2004/oct/1084588.htm>

2/24/2006

SUA

Softswitch

Speech and Audio  
Codecs

Telecom Expense Mgmt

Triple Play

Unified  
Communications

Voice over Broadband

signaling telecommunications solutions, network performance management technology, and value-added applications. Tekelec's innovative solutions are widely deployed in traditional and next-generation wireline and wireless networks and contact centers worldwide. Corporate headquarters are located in Calabasas, Calif., with research and development facilities and sales offices throughout the world.

VocalData, a Tekelec company, provides an integrated suite of hosted IP telephony applications that enable service providers to reliably and cost-effectively deliver voice-over-IP solutions. VocalData's award-winning application server is an open solution that allows service providers to deliver higher value telephony services to business and residential customers. Through its more than 50 customers and broad partner base, VocalData supports more than 225,000 deployed enhanced IP telephony lines today.

For more information, please visit [www.tekelec.com](http://www.tekelec.com).

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VoIP

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Product	Description	Best Deals
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<b>Avocent SwitchView IP (SVIP1010-AM) Remote Control</b>		
		
		
		

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TMC is now accepting applications for the 2005 PlanetPDA Product of the Year Award

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Disaster Recovery for the Call Center Focus of Upcoming Webinar

<http://www.tmcnet.com/submit/2004/oct/1084588.htm>

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[February 18, 2004]

## Blueriver and Telekenex Purchase Taqua's Packet Switching Solution

Taqua(R), Inc., a leading provider of next-generation voice switching systems and technologies, today announced two additional CLECs have chosen the iX7000 next generation Class 5 packet switch. Telekenex has chosen the iX7000 as the foundation for their next-generation voice and data service offerings and Blueriver Communications is using the iX7000 for data offload applications.

"Competitive carriers can utilize the iX7000 in a variety of applications that can both save costs and increase revenues," said Gary Brown, executive vice president of sales for Taqua, Inc. "Over the last two years, Taqua has experienced increased demand for not only voice, but data applications as well. While the overwhelming majority of our 85 customers are using the iX7000 to deliver facilities-based voice services, many carriers are also using it to save costs through Internet offload configurations."

The iX7000 provides a simple, single-box solution for providing Internet Offload with a seamless migration to offer Class 5 voice services. Instead of using PRIs to the incumbent local exchange carrier, competitive or Internet service providers can use SS7 links and save on monthly charges. Blueriver Communications, the CLEC division of Blueriver Networking Services, is using Taqua's iX7000 to provide PRI facilities for ISP services to bypass the high-cost of buying traditional retail service. Blueriver Networking has been serving southern Indiana since 1995 with dialup and dedicated IP network services, and realized the need to minimize overhead costs to remain competitive for many years.

"We needed an offload solution that could save us operational costs and give us greater control," explained Craig Brown, CEO of Blueriver Communications. "The iX7000 provided a quick return on our initial

<http://www.tmcnet.com/usubmit/2004/feb/1024060.htm>

2/24/2006

Headsets

investment, and we are now realizing a savings of thousands of dollars a month. At the same time, it positions us to easily deploy voice services if we go down that path."

Hosted IP

Hosted VoIP

Hybrid IP

Internet Phone

IP Communications

Telekenex provides next-generation voice and data solutions throughout the United States. The company has been providing these services profitably since 1996 and is currently expanding its service offering to include bundled, hosted and managed solutions. "We made the decision to go with the iX7000 to build a strong foundation to deploy new and differentiated voice and data services," said Anthony Zabit, chief operating & financial officer of Telekenex. "We looked at all the next-generation voice switching solutions and ultimately chose Taqua's iX7000 because it's the most widely deployed and versatile system available. The iX7000 allows us to deliver a differentiated and bundled service offering of local, long distance, and data services to our customers. It also provides us the foundation to deliver hosted

Message

**Sarah DeYoung**

**From:** Anthony Zabit  
**Sent:** Tuesday, March 07, 2006 12:51 PM  
**To:** 'O'SULLIVAN, PAUL'  
**Cc:** 'HEALY, ROBERT'; Mike Lynch; 'glenn@stoverlaw.net'  
**Subject:** FW: CAPS document

Paul,

I have a few comments and question that I need clarified. Please forward to someone who can internally explain SBC/ATT's position on the issues discussed below.

In regards the the attached accessible letter:

The limitation of the number of DS1s of transport is specific to the number of circuits between specific CO's only when both transport and DS3 are unimpaired between both Co's. Transport is not unimpaired just because one of the offices involved is unimpaired for transport. In addition the 10 circuit limit does not apply unless both wire centers are unimpaired for DS3 transport and in that case the limit applies to transport between those specific CO's.

In addition as we are discussing migration of Unimpaired transport and unimpaired loop components I brought up that only the unimpaired components need be migrated and the impaired components loops and or transport will remain UNE in a commingled arrangement.

In our conference call last week my director of network ops. (Mike Lynch) was told that if one of the wirecenters was unimpaired for transport (as an example) the entire circuit was considered unimpaired and would be migrated to special access.

Paul as you know there is a lot of uncertainty at SBC/ATT and confusion with us, your customer, as to how you as a company are planning to implement this "automatic conversion" to special access. You can imagine the billing chaos that will ensue if you proceed down a forced special access migration incorrectly and we need to not only dispute billing on components of 100s of circuits, but also have you change components back to UNE that you incorrectly migrated. I bring these items up now in advance of our settlement call because it is important that we come to some sort of resolution in advance of your plans next week.

I do not believe that even SBC/ATT has the processes in place to migrate components of individual circuits to special access while leaving some components as UNE's. If I am incorrect please provide order examples. In addition the fact that no one that we have spoken to clearly understands the moving parts and rules associated with the new rules means that it would be impossible for you to implement correctly.

It would be most prudent to give everyone more time to agree on the groundrules before further complicating the situation.

**I propose the following settlement:**

**CF Communications LLC dba Telekenex agrees to pay a one time settlement of \$10,000 as consideration for additional charges that may be incurred for costs associated with unimpaired DS1 loops and transport that would have been incurred had the unimpaired components been converted to special access by SBC during the "transition period". The transition period shall be the period from the execution of this agreement and May 31<sup>st</sup>. I proposed this date as it is the end of the month and thus an easier time frame to quantify billing. As additional consideration for this concession we agree to waive our right to dispute and collect compensation from SBC for UNE circuits that have been migrated to our switch and we have continued to be billed for over the past 2.5 years. There are a number of circuits that we are finding that have been migrated to our switch but still continue to be billed to us as UNEP circuits. In this case obviously the port order was implemented and the disconnect was not. I am finding this on both DS1 and**

3/9/2006



Message

**DSO UNEP circuits. At present we have identified and have submitted a dispute for 14030.66. There are numerous other circuits that we are finding during our migration that have been billed to us over 2 years and have not yet submitted the remainder of the disputes.**

**Again as I mentioned above it would be best if we can move forward in an orderly fashion as opposed to the chaos that I am sure would ensue if you move forward on a mass migration into uncharted waters.**

**As a separate issue I would like some clarification from your product folks on the above interpretation of unimpaired transport so that we can get that behind us.**

Hopefully we can come to an amicable settlement tomorrow.

Thank you

Anthony Zabit

3/9/2006



Accessible

Date: **February 11, 2005**Number: **CLECALL05-019**Effective Date: **N/A**Category: **Loop-Transport**Subject: **(BUSINESS PROCESSES) SBC's<sup>1</sup> Implementation of the FCC TRO Remand Order for Unbundled High-Capacity Loops and Unbundled Dedicated Transport – Order Rejection**Related Letters: **[CLECALL05-020  
Loop/Transport Price  
Increase/Transition Period;  
CLECALL05-016 SBC Interim  
"UNE-P Replacement"  
Commercial Offering;  
CLECALL05-018 Letter Re:  
ULS/UNE-P Price  
Increase/Transition Period; and  
CLECALL05-017 Order Rejection  
ULS-UNE-P]**Attachment: **Yes (4)**States Impacted: **13-States**Issuing SBC ILECS: **SBC Indiana, SBC Ohio, SBC Michigan, SBC Wisconsin, SBC California, SBC Nevada , SBC Arkansas, SBC Illinois, SBC Kansas, SBC Missouri, SBC Oklahoma, SBC Texas and SBC Connecticut**Response Deadline: **N/A**Contact: **Account Manager**Conference Call/Meeting: **N/A**To: **SBC's Local Wholesale Customers**

On February 4, 2005, the FCC issued its "TRO Remand Order", concerning the provision of unbundled network elements. As set forth in the TRO Remand Order, specifically in Rule 51.319(a)(6), as of March 11, 2005, CLECs "may not obtain," and SBC and other ILECs are not required to provide access to Dark Fiber Loops on an unbundled basis to requesting telecommunications carriers. The TRO Remand Order also finds, specifically in Rules 51.319(a)(4), (a)(5) and 51.319(e), that, as of March 11, 2005, CLECs "may not obtain," and SBC and other ILECs are not required to provide access to DS1/DS3 Loops or Transport or Dark Fiber Transport on an unbundled basis to requesting telecommunications carriers under certain circumstances. Therefore, as of March 11, 2005, in accordance with the TRO Remand Order, CLECs may not place, and SBC will no longer provision New, Migration or Move Local Service Requests (LSRs) for affected elements.

There are different impairment findings in the TRO Remand Order for each category of elements addressed by this Accessible Letter. To address the differences and to ensure clarity, SBC has included separate attachments for DS1 and DS3 Unbundled High Capacity Loops, DS1 and DS3 Unbundled Dedicated Transport (UDT), Unbundled Dark Fiber Loops and Dark Fiber Unbundled Dedicated Transport. Please refer to the appropriate attachment to determine how orders for each category of elements will be treated in light of the TRO Remand Order.

---

<sup>1</sup> References to "SBC" in this Accessible Letter encompass, as applicable, the Issuing SBC ILECs identified at the beginning of this letter.

The effect of the TRO Remand Order on New, Migration or Move LSRs for these affected elements is operative notwithstanding interconnection agreements or applicable tariffs.

Should you have any questions regarding this implementation notice, please contact your Account Manager.

**CLECALL05-019**

**LOOPS ATTACHMENT: Implementation Plan for DS1 and DS3 High-Capacity Loops – Order Rejection.**

**New Local Service Requests (LSRs).**

As of the effective date of the TRO Remand Order, i.e., March 11, 2005, you are no longer authorized to place, nor will SBC accept New, Migration or Move LSRs for DS1 or DS3 High-Capacity Loops in excess of the caps established by Rule 51.319(a)(4) and 51.319(a)(5) or in service areas served by Wire Centers meeting the criteria set forth by the FCC in its TRO Remand Order, Rules 51.319(a)(4) and 51.319(a)(5) ("Affected DS1 and DS3 High-Capacity Loops"). Any New, Migration or Move LSRs placed for Affected DS1 or DS3 High-Capacity Loops on or after March 11, 2005 will be rejected.

**CLECALL05-019**

**TRANSPORT ATTACHMENT: Implementation Plan for DS1 and DS3 Dedicated Transport – Order Rejection.**

**New Local Service Requests (LSRs).**

As of the effective date of the TRO Remand Order, i.e., March 11, 2005, you are no longer authorized to place, nor will SBC accept New, Migration or Move LSRs for DS1 or DS3 Dedicated Transport in excess of the caps established by Rule 51.319(e)(2)(ii) and Rule 51.319(e)(2)(iii) or on routes between Wire Centers meeting the criteria set forth by the FCC in its TRO Remand Order, Rule 51.319(e)(2)(ii) and Rule 51.319(e)(2)(iii) ("Affected DS1 or DS3 Dedicated Transport"). Any New, Migration or Move LSRs placed for Affected DS1 or DS3 Dedicated Transport on or after March 11, 2005 will be rejected.

**CLECALL05-019**

**DARK FIBER LOOPS ATTACHMENT: Implementation Plan for Dark Fiber Loops– Order Rejection.**

**New Local Service Requests (LSRs).**

As of the effective date of the TRO Remand Order, i.e., March 11, 2005, pursuant to Rule 51.319(a)(6), you are no longer authorized to place, nor will SBC accept New, Migration or Move LSRs for Dark Fiber Loops. Any New, Migration or Move LSRs placed for Dark Fiber Loops on or after March 11, 2005 will be rejected.

**CLECALL05-019**

**DARK FIBER TRANSPORT ATTACHMENT: Implementation Plan for Dark Fiber Dedicated Transport- Order Rejection.**

**New Local Service Requests (LSRs).**

As of the effective date of the TRO Remand Order, i.e., March 11, 2005, pursuant to Rule 51.319(e)(iv), you are no longer authorized to place, nor will SBC accept New, Migration or Move LSRs for Dark Fiber Dedicated Transport in service areas between Wire Centers meeting the criteria set forth by the FCC in its TRO Remand Order ("Affected Dark Fiber Dedicated Transport"). Any New, Migration or Move LSRs placed for Affected Dark Fiber Dedicated Transport served by these Wire Centers on or after March 11, 2005 will be rejected.

**Sarah DeYoung**

---



transition  
matrix1.doc (40 KB).

-----Original Message-----

From: Anthony Zabit  
Sent: Monday, March 06, 2006 5:45 PM  
Cc: 'PAUL O'SULLIVAN (PTSS) (po2652@sbc.com)'; 'glenn@stoverlaw.net'  
Subject: FW: URGENT - CLEC Notice - 24 HOUR TURN AROUND FOR CLEC

Bob,

Per our conference call of last week I am still waiting on a few items from Paul in regards to conversion of our remaining lines from UNEP to resale.

As I have been communicating for months there are logistical barriers to determining the relatively few lines that still need to be migrated. We have been coming upon a fair amount of lines that we are still being billed for that have already been migrated. This has made it very difficult to ascertain what lines are truly left to be migrated. Our solution has been to migrate as many lines as possible prior to March 1 in order to create a relatively small number of lines that we show in our records and that you show on our bill from which we will create a final reconciliation and ultimately conversion orders to resale.

In our conversation last week I explained that I would be happy to place the orders for the migration of the remaining lines to resale upon identification of the remaining lines. I explained that upon receipt and analysis of my March 1/feb 28 bill I would be able to identify the small subset of customers that I missed. This analysis will take roughly a week following receipt of the bill. At that point we will place all of the migration orders within 1-2 weeks depending on volume.

You mentioned that you thought that you could provide us with a "snapshot" of the lines left to be migrated. You had mentioned that you thought you could get back to me on the snapshot by Monday. It would be great if we could discuss this component after we discuss the settlement on the T1 components tomorrow am.

Thanks

Anthony

-----Original Message-----

From: HEALY, ROBERT R (PB) [mailto:rh3176@att.com]  
Sent: Monday, March 06, 2006 1:02 PM  
To: Anthony Zabit  
Subject: FW: URGENT - CLEC Notice - 24 HOUR TURN AROUND FOR CLEC

> URGENT - URGENT - URGENT

>

Anthony,

> "In connection with AT&T California's Emergency Motion to Compel UNE-P  
> Transition, filed February 10, 2006, Administrative Law Judge Karen  
> Jones has authorized AT&T to instruct you to provide the daily volumes  
> of UNE-P lines that you intend to convert to UNE-L and Resale, in  
> accordance with the accompanying matrix. This information is to be  
> provided to AT&T California immediately." [matrix attached]

>

>

> <<transition matrix1.doc>>

>

> Thanks,



> Bob Healy  
> Account Mgr IM  
> 925-823-5276  
>  
>



Message

**Sarah DeYoung**

**From:** Anthony Zabit  
**Sent:** Wednesday, March 01, 2006 5:19 PM  
**To:** 'HEALY, ROBERT'  
**Cc:** Mike Lynch; 'PAUL O'SULLIVAN (PTSS) (po2652@sbc.com)'  
**Subject:** It is very important that we speak

I am sorry that you were not able to make the 2pm conference call that Mike had scheduled. We are getting down to the wire here and I need some direction.

I have a number of items that I would like to discuss:

1. Our Une transport migration
2. Orderly transition of my remaining lines to resale (lines I am unable to migrate)
3. Additional miscellaneous migration issues

I am hearing conflicting information as to whether we need to place orders to migrate UNE lines to resale. I am also wondering what happens to lines that I do not proactively move from UNEP to resale.

I would also like to discuss the process for addressing my UNE T1s. I would like to discuss a minimal extension of time yet again so that we can make this orderly. As I mentioned I will not have a good snapshot of exactly which lines I missed until I receive and analyze my March bill. This will serve no ones benefit if not done in an orderly way.

3/9/2006

Message

**Sarah DeYoung****From:** Anthony Zabit**Sent:** Tuesday, February 28, 2006 7:07 PM**To:** 'HEALY, ROBERT'**Cc:** Mike Lynch; Darrick Dobson; 'PAUL O'SULLIVAN (PTSS) (po2652@sbc.com)'**Subject:** UNE Transport Migration

Bob,

Attached is a high level analysis of the UNE transport migration that needs to take place. This is a summary of the DS1s with both Loc A and Loc Z in DS1 transport unimpaired offices (CLLI A and Z are Specified). I mentioned that this was an item that needed to be done. We need to establish a project for this and figure out how to do coordinated cuts. I have listed the circuits. Could we schedule a call tomorrow to discuss? This is not the final list as I have Darrick QA'ing the circuits as some of the CLLI's look a bit strange. I have also sorted them by the CO's where they will most likely be moved to. I have existing DS1 muxes in these locations.

I would like to discuss timelines for this as well as a methodology to make sure that my customers are not adversely affected. All of these customers have already been through one migration off of UNEP and I want to make sure that they don't feel this one.

I would also like to speak with you about the timeline required to implement this as well as an extension of the March 10<sup>th</sup> deadline to a date that will be more realistic for the accomplishment of the abovementioned migration.

Thanks

Anthony

3/9/2006

as of 1/1/06 Invoice		Circuit 2		LOCATION1		LOCATION2	
CUSTOMER NAME	CELL	CIRCUIT ID	CELL	Central Office	Eng User Loc	M-SC	phone Num
<b>Berkeley 01</b>							
Amsterdam Art	OKLDCA03W43	40HCFD512010-025	ACD	BKLYCA01	A	1801 Franklin, Oak	1013 University Av, Brk
Autumn Press	OKLDCA03W43	40HCFD512010-018	ACD	BKLYCAU0003	A	1801 Franklin, Oak	948 Camella, Brk
Autumn Press	OKLDCA03W43	40HCFD512010-017	ACD	BKLYCAU0003	A	1801 Franklin, Oak	948 Camella, Brk
Publishers Group West	OKLDCA03W43	40HCFD512010-023	ACD	BKLYCAU0003	A	1801 Franklin, Oak	1700 4th, Brk
Publishers Group West	OKLDCA03W43	40HCFD512010-029	ACD	BKLYCAU0003	A	1801 Franklin, Oak	1700 4th, Brk
Publishers Group West	OKLDCA03W43	40HCFD512010-022	ACD	BKLYCAU0003	A	1801 Franklin, Oak	1700 4th, Brk
Publishers Group West	OKLDCA03W43	40HCFD512010-021	ACD	BKLYCAU0003	A	1801 Franklin, Oak	1700 4th, Brk
<b>Richmond 11</b>							
Comcast	WNCKCA11W24	49HCFD512010-033	A	CNCRCA01	A	1755 Locust, WC	1390 Willow Pass Rd, Cnoc Ste 920
Syston Donner Automotive	WNCKCA11W24	49HCFD512010-029	A	CNCRCA01	A	1755 Locust, WC	2700 Syston Dr, Cnoc
Sitzman Morris and Lavis	OKLDCA03, SNRSCA01	40HCFD512010-018	ACD	SNRSCA01	A	1 Kaiser Plaza, Oak	2455 Bennett Valley Rd, S RS
RRMG	PLALCA02W24	77HCFD512010-084	A	SNRSCA01	A	345 Hamilton Av, PA	114 Soloyome, SR
Carlisle Macy Inc	PLALCA02W24	77HCFD512010-050	A	SNRSCA01	A	345 Hamilton Av, PA	15 3D, S Rs
Goodwill Industries	SNFCCA01W53	63HCFD512010-102	ACD	SNRSCA01	A	555 Pine St, SF	651 Yolande Av, S RS
Goodwill Industries	SNFCCA01W53	63HCFD512010-103	ACD	SNRSCA01	A	555 Pine St, SF	651 Yolande Av, S RS
Redwood Medical Group	WNCKCA11W24	49HCFD512010-010	A	SNRSCA01	A	1755 Locust, WC	121 Soloyome, S RS
RBC Mortgage	WNCKCA11W24	49HCFD512010-021	A	SNRSCA01	A	1755 Locust, WC	111 Santa Rosa Av, S RS
Redwood Medical Group	WNCKCA11W24	49HCFD512010-014	A	SNRSCA01	A	1755 Locust, WC	121 Soloyome, S RS
Redwood Medical Group	WNCKCA11W24	49HCFD512010-011	A	SNRSCA01	A	1755 Locust, WC	121 Soloyome, S RS
Redwood Medical Group	WNCKCA11W24	49HCFD512010-015	A	SNRSCARU	A	1755 Locust, WC	122 Soloyome, S RS
Redwood Medical Group	WNCKCA11W24	49HCFD512010-012	A	SNRSCAU0008	A	1755 Locust, WC	3555 Round Barn Cir, S Ra
Redwood Medical Group	WNCKCA11W24	49HCFD512010-013	A	SNRSCAU0008	A	1755 Locust, WC	3555 Round Barn Cir, S Ra
7up Bottling	SNFCCA01W53	63HCFD512010-088	ACD	SNRSCAU0043	A	555 Pine, SF	1901 Russell Av, S RS
Alzheimers Santa Rosa	SNFCCA01W44	63HCFD512010-006	ACD	SNRSCAU0052	A	555 Pine, SF	1211 N Dutton Av, S Rs
<b>Sacramento 12</b>							
Keller Williams	SCRMC01W51	15HCFD512010-033	ACD	FROKCAW	AD	1407 J, Sac	8525 Av, Fo
7up Bottling	SCRMC01W39	15HCFD512010-023	ACD	NSCRCA11	ACD	1407 J, Sac	2870 Land Av, Sac
7up Bottling	SCRMC01W39	15HCFD512010-022	ACD	NSCRCA11	ACD	1407 J, Sac	2870 Land Av, Sac
Bustos Media	SCRMC01W51	15HCFD512010-040	ACD	NSCRCA11	ACD	1407 J, Sac	1401 El Camino Av, Sac Ste 330
7up Bottling	SCRMC01W51	15HCFD512010-028	ACD	NSCRCA11	ACD	1407 J, Sac	2870 Land Av, Sac
7up Bottling	SCRMC01W51	15HCFD512010-036	ACD	NSCRCA11	ACD	1407 J, Sac	2870 Land Av, Sac
<b>San Francisco 17</b>							
Alzheimers Assoc	PLALCA02W24	77HCFD512010-048	A	MTVWCA11	AD	345 Hamilton Av, PA	2065 W El Camino Real
Alzheimers Assoc	PLALCA02W24	77HCFD512010-046	A	SNFCCA12	A	345 Hamilton Av, PA	1050 Van Ness Av, SF
Kleiner Perkins	PLALCA02W24	77HCFD512010-080	A	SNFCCA12	A	345 Hamilton Av, PA	2672 Vallejo, SF
Arnold Hotel Group	SNFCCA01, SNFCCA12	63HCFD512010-046	ACD	SNFCCA12	A	555 Pine St, SF	1090 VanNess Av, Sf
Pan Pacific Hotel	SNFCCA12	63HCFD512010-033	A	SNFCCA12	A	885 Sutter, SF	500 Post SF
Telekenex	SNFCCA21, SNFCCA12	63HCFD512010-063	ACD	SNFCCA12	A	611 Folsom, SF	338 Infantry Terrace, Presidio
Olympic Club	SNFCCA21W58	63HCFD512010-072	ACD	SNFCCA12	A	611 Folsom, SF	665 Sutter, SF
Olympic Club	SNFCCA21W58	63HCFD512010-073	ACD	SNFCCA12	A	611 Folsom, SF	665 Sutter, SF
Olympic Club	SNFCCA21W58	63HCFD512010-071	ACD	SNFCCA12	A	611 Folsom, SF	665 Sutter, SF
Georgiou	SNFCCA01, SNFCCA04	63HCFD512010-059	ACD	SNFCCA04	AD	555 Pine St, SF	808 Brannen, SF
Nibbi Brothers	SNFCCA01W53	63HCFD512010-106	ACD	SNFCCA04	AD	555 Pine St, SF	180 Hubbell, SF
Customer Click	SNFCCA21W58	63HCFD512010-084	ACD	SNFCCA04	AD	611 Folsom, SF	1550 Bryant, SF Ste 925
Nibbi Brothers	SNFCCA21W58	63HCFD512010-105	ACD	SNFCCA04	AD	611 Folsom, SF	180 Hubbell, SF
Nibbi Brothers	SNFCCA21W58	63HCFD512010-104	ACD	SNFCCA04	AD	611 Folsom, SF	180 Hubbell, SF
Demore Johann	SNFCCA21W58	63HCFD512010-159	ACD	SNFCCA04	AD	611 Folsom, SF	251 South VanNess Av, SF
Van Pelt Yi James LLP	SNJSCA02W59	70HCFD512010-077	ACD	SNJSCA12	A	95 S Almaden Av, SJ	10050 N Foothill Bl, Cprno, Ste 200
Columbus Distributing	SNFCCA01, SNBUCA02	63HCFD512010-049	ACD	SNBUCA02	A	555 Pine St, SF	465 Cabot Rd, SSF
<b>Oakland 03</b>							
Sitzman Morris and Lavis	SNFCCA01W53	63HCFD512010-111	ACD	OKLDCA03	ACD	555 Pine St, SF	1 Kaiser Plaza, Oak

## Santa Ana 11

Accelacom	SNANCA11	71100001, 800-010	ACD	SNANCA11	ACD	2740 S Harbor Bl, Sa	17520 Newhope, F Vly Ste 200
Accelacom	SNANCA11	71100001, 800-010	ACD	SNANCA11	ACD	2745 S Harbor Bl, Sa	17520 Newhope, F Vly Ste 200

## San Francisco 01

Visage Mobile	SNFCCA21W58	63HCFD512010-091	ACD	SNFCCA01	ACD	611 Folsom, SF	300 California, SF
SF Legal Copy	SNFCCA21W58	63HCFD512010-182	ACD	SNFCCA01	ACD	611 Folsom, SF	100 California, Ste B10
Visage Mobile	SNFCCA21W58	63HCFD512010-067	ACD	SNFCCA01	ACD	611 Folsom, SF	300 California, SF
Pedder Kolling Tompkins	SNFCCA21W58	63HCFD512010-155	ACD	SNFCCA01	ACD	611 Folsom, SF	450 Butler, SF Ste 820
Steinberg Group	SNFCCA21W58	63HCFD512010-180	ACD	SNFCCA01	ACD	611 Folsom, SF	98 Battery, SF Ste 300
Steinberg Group	SNFCCA21W58	63HCFD512010-181	ACD	SNFCCA01	ACD	611 Folsom, SF	98 Battery, SF Ste 300
Bandy Babcock	SNFCCA21W58	63HCFD512010-153	ACD	SNFCCA01	ACD	611 Folsom, SF	1 Beach, SF Ste 301
McGrane Greenfield	SNFCCA21W58	63HCFD512010-155	ACD	SNFCCA01	ACD	611 Folsom, SF	1 Ferry Bldg, Ste 220
Grant Scott Hurley	SNFCCA21W58	63HCFD512010-154	ACD	SNFCCA01	ACD	611 Folsom, SF	451 Pacific Av, SF
Bryce	PLALCA02W24	77HCFD512010-040	A	SNFCCAPC	ACD	345 Hamilton Av, PA	580 California, SF Fir 8
Bryce	PLALCA02W24	77HCFD512010-041	A	SNFCCAPC	ACD	345 Hamilton Av, PA	580 California, SF Fir 8
Kleiner Perkins	PLALCA02W24	77HCFD512010-062	A	SNFCCATE	ACD	345 Hamilton Av, PA	100 Drumm, SF Ste 3520
Bain Company	SNFCCA21W58	63HCFD512010-076	ACD	SNFCCATP	ACD	611 Folsom, SF	301 Clay, SF
Bain Company	SNFCCA21W58	63HCFD512010-077	ACD	SNFCCATP	ACD	611 Folsom, SF	301 Clay, SF
Bain Company	SNFCCA21W58	63HCFD512010-074	ACD	SNFCCATP	ACD	611 Folsom, SF	301 Clay, SF
Bain Company	SNFCCA21W58	63HCFD512010-076	ACD	SNFCCATP	ACD	611 Folsom, SF	301 Clay, SF
Berrist-Koehler Publisher	SNFCCA21W58	63HCFD512010-189	ACD	SNFCCAHK	ACD	611 Folsom, SF	235 Montgomery, SF Ste 650
Common Wealth	SNFCCA21W58	63HCFD512010-187	ACD	SNFCCAMB	ACD	611 Folsom, SF	595 Market, SF

## San Francisco 21

Banding, Micklow, Bull	PLALCA02W24	77HCFD512010-055	A	SNFCCA21	ACD	345 Hamilton Av, PA	1 Market Plaza, SF Ste 1440
Engage PR	PLALCA02W24	77HCFD512010-051	A	SNFCCA21	ACD	345 Hamilton Av, Pa	303 2D, SF
Moad	PLALCA02W24	77HCFD512010-038	A	SNFCCA21	ACD	345 Hamilton Av, PA	90 New Montgomery, SF Ste 420
Moad	PLALCA02W24	77HCFD512010-039	A	SNFCCA21	ACD	345 Hamilton Av, PA	90 New Montgomery, SF Ste 420
Outcast Communications	SNFCCA01W44	63HCFD512010-173	ACD	SNFCCA21	ACD	555 Pine, SF	123 Townsend, SF
Outcast	SNFCCA01W53	63HCFD512010-118	ACD	SNFCCA21	ACD	555 Pine St, SF	123 Townsend, SF
Ubisoft	SNFCCA01W53	63HCFD512010-119	ACD	SNFCCA21	ACD	555 Pine St, SF	625 3d, SF
PC Guardian	SNFCCA01W53	63HCFD512010-149	ACD	SNFCCA21	ACD	555 Pine, SF	475 Brannan, Ste 420

## San Jose 02

Steinberg Group	SNUSCA01W40	70HCFD512010-020	AD	SNUSCA02	ACD	1700 Space Park Dr, S Clara	60 Pierce Av, SJ
Steinberg Group	SNUSCA01W40	70HCFD512010-021	AD	SNUSCA02	ACD	1700 Space Park Dr, S Clara	60 Pierce Av, SJ

## San Jose 21

Telikoku	SNUSCA02W59	70HCFD512010-056	ACD	SNUSCA21	ACD	95 S Almaden Av, SJ	1718 Ringwood Av, SJ
Wells Fargo	SNUSCA02W59	70HCFD512010-063	ACD	SNUSCA21	ACD	95 S Almaden Av, SJ	2107 N 1st SJ
Telikoku	SNUSCA01, SNUSCA21	70HCFD512010-015	AD	SNUSCA21	ACD	1700 Space Park Dr, SC	1718 Ringwood Av, SJ
Infotrend	SNUSCA01, SNUSCA21	70HCFD512010-016	AD	SNUSCA21	ACD	3160 Coronado Dr, SC	1949 Lundy Av, SJ
Business Resource Group	SNUSCA01W40	70HCFD512010-031	AD	SNUSCA21	ACD	1700 Space Park Dr, SC	2202 N 1st, SJ
Business Resource Group	SNUSCA01W40	70HCFD512010-030	AD	SNUSCA21	ACD	1700 Space Park Dr, SC	2202 N 1st, SJ
Santa Clara Co Assoc of Realt	SNUSCA01W40	70HCFD512010-011	AD	SNUSCA21	ACD	1700 Space Park Dr, S Clara	1651 N 1st, SJ
Business Resource Group	SNUSCA01W40	70HCFD512010-029	AD	SNUSCA21	ACD	1700 Space Park Dr, SC	2202 N 1st, SJ

## Santa Clara 01

Mercora	SNUSCA21, SNUSCA01	61100001, 800-010	ACD	SNUSCA01	AD	611 Folsom, SF	3970 Freedom Cir, S Clara
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